

Remarks

Claims 1-41 are currently pending and stand rejected. Claims 6, 7, 15, 16, 25 and 40 have been amended. Applicants assert that the claims are now in condition for allowance as set forth more fully below.

Claim Objections

Claims 6, 7, 15, 16 and 25 have been amended to correct the spelling of updateable to updatable. As such the objections can now be withdrawn.

103 Rejections

Claims 1-2, 4, 6, 8, 10-11, 13, 15, 17, 19, 22, 24-26, 28-32, 34, 36-38 and 40-41 stand rejected under 35 USC §103(a) as being unpatentable over Kirkwood '662 (US Pat. 6,665,662) in view of Adamchick (US Pat. 5,761,668). Claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39 stand rejected as being unpatentable over Kirkwood '017 (US Pat 5,813,017) in view of Official Notice. Applicants respectfully traverse these rejections.

Claims 1-2, 4, 6, 8, 10-11, 13, 15, 17, 19, 22, 24-26, 28-32, 34, 36-38 and 40-41

The Office Action asserts that the referenced claims are unpatentable under Kirkwood '662 in view of Adamchick. The Office Action asserts that Kirkwood '662 teaches all of the recited elements of independent claims 1, 10, 19, 31, 36, 37, 40, and 41 with the exception of indicating wherein the manipulation includes data changing a date within a portion of the data from a year representation of a first set of digits to a year representation of a second set of digits or changing the case of a character from one case to another case. The Office Action further asserts that Adamchick cures the cited deficiency of Kirkwood '662.

However, applicants assert that independent claims 1, 10, 19, 31, 36, 37, 40, and 41 each contain additional similar elements not disclosed by Kirkwood '662, Adamchick or a combination thereof. As a representative example independent claim 1 recites,

“[a] client-server computer system comprising:

at least one client application server that utilizes data in a form other than an initial form and generates a manipulation request for manipulation of the data from the initial form wherein the request includes the data in the initial form...”.

Such a recitation is contrary to Kirkwood ‘662. Kirkwood ‘662 teaches that a data query and manipulation request alone is translated by the client into a mark up language, the data requested by the query is gathered and manipulated by the application server according to the markup language query and the result is returned to the client where the client translates the information from the markup language and extracts the data queried for. (Col. 3, l. 5-15; Col. 21, l. 50-65). The query sent by the client in Kirkwood ‘662 does not include the data [to be manipulated] nor would it be included in the initial form as it would have been translated. Instead the Query in Kirkwood ‘662 is a request for data to be obtained, rather than a request that provides the data that is ultimately to be manipulated as recited in the claims. As such, Kirkwood ‘662 is deficient in other elements and continues to fail to disclose all of the elements of the claim recitations as asserted in the Office Action. Adamchick concerns itself with calendar date conversions and also fails to cure the deficiencies of Kirkwood ‘662. Therefore independent claims 1, 10, 19, 31, 36, 37, 40 and 41 are patentable over Kirkwood ‘662 in view of Adamchick for at least this reason. Dependent claims 2-8, 11-18, 20, 30, 33-35 and 38-39 depend from one of allowable independent claims 1, 10, 19, 31, 36, 37, 40, and 41 and are allowable for at least this same reason.

Claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39

As discussed above in regards to Kirkwood ‘662, dependent claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39 depend from one of allowable independent claims 1, 10, 19, 31, 36, 37, 40, and 41. Each dependent claim contains all of the elements of their respective allowable independent claims and are allowable for at least the same reasons.

Furthermore, the Office Action is ambiguous in regards to it’s reference Kirkwood (US Patent 5,761,668). US Patent 5,761,668 is issued to Morris. In the interest of an efficient prosecution, applicants assume the cited reference is US Patent 5,761,668 to Morris. However, Morris in combination with Official Notice that it would

have been obvious to use LDAP in a Morris system, fails to teach or disclose several of the elements recited in any of the independent claims 1, 10, 19, 31, 36, 37, 40, or 41. Nor does Morris cure the deficiencies of Kirkwood '662. Morris addresses the updating of a compressed file stored on a server by comparing the server's backup file with the file updated by the client and does not concern itself with the subject matter of the recitations and as such appears to be non-analogous art. Morris merely updates a server based on an input from the client rather than having a server manipulate the client's data and return the manipulated data to the client. Morris therefore fails to disclose several of the recitations of the claims. As such claims 3, 5, 7, 9, 12, 14, 16, 18, 21, 23, 27-30, 33, 35 and 39 are allowable over Kirkwood '662 in view of Morris.

Further still, Morris does not suggest or provide explicit or implicit motivation to represent the data schema via LDAP. A reference must provide an explicit or implicit suggestion, teaching or motivation in order to be §103 prior art. (See, *In Re Dembiczak*, 175 F.3d 994, 50 U.S.P.Q.2D (BNA) 1614 (Fed. Cir. 1999) (Placing a pumpkin face on an orange trashbag not obvious under 35USC §103 without finding of suggestion, teaching or motivation in the reference); *SIBIA Nerosciences, Inc. v. Cadus Pharm. Corp.*, 225 F.3d 1349, 55 U.S.P.Q.2D (BNA) 1927 (Fed. Cir. 2000)(Suggestion or motivation to modify a single reference required for obviousness rejection). Furthermore, an argument based on the theory that "it was obvious to try" fails as an obviousness rejection. *In re Fine*, 837 F.2d 1071, U.S.P.Q.2D 1596 (Fed. Cir 1988). Applicant's respectfully request a copy of the references that suggest or motivate the integration of LDAP to modify Morris that results in the functionality of the recited claims. Those teachings must also have a reasonable chance at success (See, *Brown & Williamson Tobacco Corp. v. Phillip Morris, Inc.*, 229 F.3d 1120, 56 U.S.P.Q.2D (BNA) 1456 (Fed. Cir. 2000).

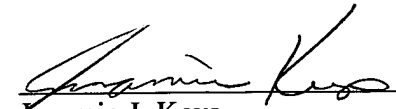
Conclusion

Applicants assert that the application including claims 1-41 is now in condition for allowance. Applicants request reconsideration in view of the amendments and remarks above and further request that a Notice of Allowability be provided. Should the Examiner have any questions, please contact the undersigned.

No fees beyond the fee for continued examination are believed due. However, please charge any additional fees or credit any overpayment to Deposit Account No. 50-3025.

Respectfully submitted,

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